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August 21, 2001

Mr. Guy M. Hicks  
BellSouth Telecommunications, Inc.  
333 Commerce Street, Suite 2101  
Nashville, TN 37201- 3300

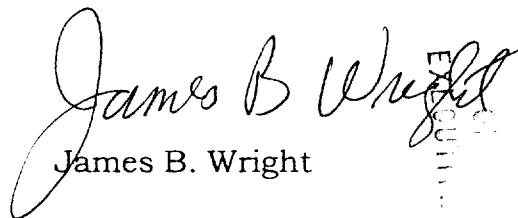
RE: Docket No. 97-00309; BellSouth 271 Application.  
Sprint Discovery Request to BellSouth

Dear Mr. Hicks:

Pursuant to the August 6, 2001 Notice of Filing issued in the above case, enclosed is Sprint Communications Company L. P.'s First Interrogatories and Request for Production of Documents to BellSouth Telecommunications, Inc.

Please contact me if you have any questions.

Sincerely,

  
James B. Wright

cc: Mr. David Waddell - 14 copies  
Parties of Record - 1 copy  
Laura Sykora  
Kaye Odum

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CERTIFICATE OF SERVICE  
Docket No. 97-00309; BellSouth 271

I hereby certify that on August 21, 2001, a copy of the foregoing document was served on the parties of record, postage pre-paid, addressed as follows:

H. LaDon Baltimore  
Farrar & Bates  
211 Seventh Ave. N, Ste 320  
Nashville, TN 37219-1823

Donald L. Scholes  
Branstetter, Kilgore, et al.  
227 Second Ave.N., 4<sup>th</sup> Floor  
Nashville, TN 37210-1631

James Lamoureux, Esquire  
AT&T Communications of the  
South Central States  
1200 Peachtree St., NE  
Atlanta, GA 30309

Guy M. Hicks  
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P.O. Box 198062  
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Boult, Cummings, et al.  
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Nashville, TN 37219-8062

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Nashville, TN 37219-2327

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Six Concourse Pkwy, Ste 3200  
Atlanta, GA 30328

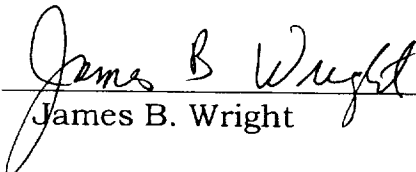
Cynthia Kinser  
Consumer Advocate and  
Protection Division  
426 5<sup>th</sup> Av North, 2<sup>nd</sup> Floor  
Nashville, TN 37243

Guilford Thornton  
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424 Church Street, Ste 2800  
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105 Malloy St. Ste 100  
Nashville, TN 37201

  
James B. Wright

**BEFORE THE**  
**TENNESSEE REGULATORY AUTHORITY**

<b>In re:</b> <b>BELLSOUTH TELECOMMUNICATIONS,</b> <b>INC.'S ENTRY INTO LONG DISTANCE</b> <b>(INTERLATA) SERVICE IN TENNESSEE</b> <b>PURSUANT TO SECTION 271 OF THE</b> <b>TELECOMMUNICATIONS ACT OF 1996</b>	<b>Docket No. 97-00309</b>
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**SPRINT COMMUNICATIONS COMPANY L.P.'S**  
**FIRST INTERROGATORIES AND REQUEST**  
**FOR PRODUCTION OF DOCUMENTS TO**  
**BELLSOUTH TELECOMMUNICATIONS, INC.**

Sprint Communications Company L.P. ("Sprint"), by and through its undersigned counsel, hereby serves its First Interrogatories and Requests for Production of Documents ("Requests") to BellSouth Telecommunications, Inc. ("BellSouth"). These Interrogatories and Requests are to be answered under oath by officers or agents of BellSouth who are qualified to answer and who shall be fully identified, with answers to be served upon Sprint on or before September 4, 2001.

**DEFINITIONS**

"You," "your," or "BellSouth" refers to BellSouth Telecommunications, Inc., its officers, employees, and authorized agents.

"Employee(s)" means those persons in the direct employment of BellSouth, past and present.

"Document" or "documentation" means any medium upon which intelligence or information can be recorded or retrieved, and includes, without limitation, the original and each copy, regardless of origin and location, of any book, pamphlet, periodical, letter, memorandum (including any memorandum or report of a meeting

or conversation), invoice, bill, order, form, receipt, financial statement, accounting entry, diary, calendar, telex, telegram, e-mail, facsimile ("fax"), cable, report, recording, contract, agreement, study, handwritten note, drawing, sketch, graph, index, list, tape, photograph, microfilm, data sheet or data processing tape, disk, file stored on computer, or any other written, recorded, transcribed, punched tape, filmed or graphic matter, however produced or reproduced, which is in your possession, custody, control or otherwise accessible to you or which was, but is no longer, in your possession, custody or control.

"Identification" or "identify" when used in reference to: (i) a natural individual, requires you to state his or her full name, residential and business address, and business relationship to BellSouth or Sprint; (ii) a corporation, requires you to state its full corporate name and any names under which it does business, the state of incorporation, and the address of its principal place of business; (iii) a document, requires you to state the nature of the document in sufficient detail for identification in a request for production, its title, its date, the name or names of its authors and recipients, its present location or custodian, and if the information or document identified is recorded in electrical, optical or electromagnetic form, a description of the computer hardware and software required to reduce it to humanly readable form; (iv) a communication, requires you, if any part of the communication was written, to identify the document or documents which refer to or evidence the communication, and to the extent that the communication was not written, to identify the persons participating in the communication and to state the date, manner, place, and substance of the communication.

"Act" refers to the Communications Act of 1934, as amended (including, without limitation, as amended by the Telecommunications Act of 1996).

"CLEC" means a local exchange carrier that is not an ILEC.

"ILEC" means an incumbent local exchange carrier as defined in 47 U.S.C. Section 251(h).

"Sprint" refers to Sprint Communications Company L.P.

"Telecommunications Service," "basic local exchange" and "local exchange services" are used herein to have the same definitions contained in federal and state rules and regulations.

"Person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

"And" and "or" shall be construed both conjunctively and disjunctively, and each shall include the other whenever such construction will serve to bring within the scope of these interrogatories anything that would not otherwise be brought within their scope.

#### **INSTRUCTIONS**

These Interrogatories and Requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. When the information requested by an Interrogatory or Request varies over time, state the response for each period of time as to which the response differs, and identify the time periods. If you cannot answer an Interrogatory or Request in full after exercising due diligence to secure all the information requested, or do not have precise information with regard to any part of an Interrogatory or Request, you should so state in your response, describing in full your efforts to obtain the information requested, and then proceed to respond to the fullest extent possible. If you object to any part of an Interrogatory or Request, answer all parts of the

Interrogatory or Request to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.

These Interrogatories and Requests are continuing in nature. Thus, in the event that you obtain additional information with respect to any Interrogatory or Request after it has been answered, you are required to supplement your response promptly following receipt of such additional information, giving the additional information to the same extent as originally requested. If you are unwilling to supplement your responses, please so state.

If any response required by way of answer to these Interrogatories or Request is considered to contain confidential or protected information, please furnish this information subject to an appropriate protective agreement.

In the event you assert that any information requested herein is privileged, you should identify any such information and any supporting documents in your written response, by date, and provide a general description of its content. You also should identify all persons who participated in the preparation of the document and all persons, inside or outside of BellSouth, who received a copy, read or examined any such document. In addition, you should describe, with particularity, the grounds upon which privilege is claimed.

In the event that you assert that any requested information is not available in the form requested, in your written response thereto, you should disclose the following:

- a. The form in which the requested information currently exists (identifying documents by title or description);

b. The earliest dates, time period, and location that representatives of Sprint may inspect your files, records or documents in which the information currently exists.

For each Interrogatory and Request answered, provide the name of the person or persons answering, the title of such person(s), and the name of the witness or witnesses who will be prepared to testify concerning the matters contained in each response. If you do not intend to call or present a witness who is prepared to testify concerning the matters contained in any response, please so state.

Unless otherwise indicated, the information sought in these Interrogatories and Requests relates to BellSouth's operations in Tennessee. However, where a response to an Interrogatory is true for, or reflects BellSouth's position on a region-wide basis, Sprint requests that BellSouth so indicate in the response.

### **INTERROGATORIES**

1. Please identify any and all BellSouth databases containing Loop Make-Up ("LMU") information for Tennessee.
2. For each database identified in response to Interrogatory No. 1, please indicate whether competing local exchange carriers ("CLECs") have access to the Tennessee LMU information contained in such databases, and the manner in which CLECs are provided access (e.g., electronic, etc.). If CLECs are permitted electronic access to the databases in question, please identify the BellSouth electronic interface (e.g., TAG, RoboTAG, LENS, etc.) through which electronic access is provided.

3. For each database identified in response to Interrogatory No. 1, please indicate the manner of access (e.g., electronic, etc.) that BellSouth personnel have to Tennessee-specific LMU information.
4. For each wire center associated with BellSouth's Tennessee operations, please identify the percentage of loops by wire center for which LMU information is populated in BellSouth's Loop Facility Assignment and Control System ("LFACS") database.
5. For each wire center associated with BellSouth's Tennessee operations, please identify the percentage of loops by wire center for which LMU information is populated in the databases available to BellSouth personnel for obtaining LMU information.
6. Do CLEC's operating in Tennessee have access to BellSouth's Corporate Facilities Database, Loop Engineering Information System ("LEIS") database and Loop Engineering Assignment Data ("LEAD") system database? If so, please indicate the manner in which CLEC's are permitted access (e.g. electronic, etc.). If CLEC's are permitted electronic access to the databases in question, please identify the BellSouth electronic interface (e.g. TAG, RoboTAG, LENS, etc.) through which electronic access is provided. For purposes of this question, the "Corporate Facilities" database, the LEIS database, and the LEAD database means those databases, regardless of their names used in Tennessee, that are identified and discussed on pages 67 – 77 of the North Carolina Utilities Commission's Recommended Order Concerning All Phase I and II Issues



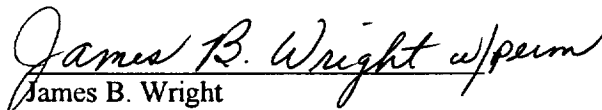
Excluding Geographic Deaveraging, in Docket No. P-10, Sub 133d (issued June 7, 2001).

7. Do BellSouth Tennessee personnel have electronic access to BellSouth's Corporate Facilities database, LEIS database, and LEAD database?
8. Please identify and provide a copy of all BellSouth documents generated during the year 2000 and the current year to date that discuss CLEC access to LMU information in Tennessee.

#### **REQUESTS FOR PRODUCTION OF DOCUMENTS**

1. Please produce all responses by BellSouth to the discovery requests of other parties in this docket.
2. Please produce all documents produced by BellSouth in response to the discovery requests of other parties in this docket.

Respectfully submitted this 21<sup>st</sup> day of August, 2001.

  
James B. Wright  
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Wake Forest, NC 27587  
(919) 554-7587

Attorney for Sprint Communications  
Company L.P.